

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

LOUIS G. RASETTA and JOHN J. SHAUGHNESSY,
as they are TRUSTEES, INTERNATIONAL UNION
OF OPERATING ENGINEERS LOCAL 4 HEALTH
AND WELFARE, PENSION AND ANNUITY FUNDS,
and LOUIS G. RASETTA and CHRISTOPHER
BARLETTA, as they are TRUSTEES, HOISTING AND
PORTABLE ENGINEERS LOCAL 4 APPRENTICE
AND TRAINING FUNDS and INTERNATIONAL
UNION OF OPERATING ENGINEERS, LOCAL 4,
Plaintiffs

C.A. No. 05-10425 RCL

vs.

SAI SURVEYING CORPORATION and
BARBARA SZEPAWOWSKI,
Defendants

and

CITIZENS BANK,
Trustee

VERIFIED REQUEST TO ENTER DEFAULT

Plaintiffs Louis G. Rasetta and John J. Shaughnessy, as they are Trustees, International Union of Operating Engineers Local 4 Health and Welfare, Pension and Annuity Funds, et al, request the Clerk to enter the default of SAI Surveying Corporation (hereinafter "SAI"). This request is made pursuant to Rule 55(a), Fed.R.Civ.P. In support of this request, the Plaintiffs say:

- 1) This action was filed on March 3, 2005.
- 2) Complaint was served on defendant SAI on April 29, 2005.
- 3) SAI has filed neither an Answer nor a responsive pleading to the Complaint.

WHEREFORE, plaintiffs seek the entry of Default in this matter.

Respectfully submitted,

LOUIS G. RASETTA and JOHN J.
SHAUGHNESSY, as they are TRUSTEES,
INTERNATIONAL UNION OF
OPERATING ENGINEERS LOCAL 4
HEALTH AND WELFARE FUND, et al,

By their attorneys,

/s/ Gregory A. Geiman
Anne R. Sills, Esquire
BBO #546576
Gregory A. Geiman, Esquire
BBO #655207
Segal, Roitman & Coleman
11 Beacon Street
Suite #500
Boston, MA 02108
(617) 742-0208

Dated: May 23, 2005

VERIFICATION

I, Gregory A. Geiman, verify that I have read this Verified Request to Enter Default and that the facts set out in the Request are true to the best of my knowledge and belief.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above Verified Request to Enter Default has been served by first class mail upon defendants SAI Surveying Corporation and Barbara Szepatowski at 23 Narragansett Avenue, Jamestown, RI 02835 this 23rd day of May, 2005.

/s/ Gregory A. Geiman
Gregory A. Geiman, Esquire